

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MICHELLE CAIN and RADHA SAMPAT,

Plaintiffs,

v.

REDBOX AUTOMATED RETAIL, LLC,

Defendant.

Case No. 2:12-cv-15014-GER-LJM
Honorable Gerald E. Rosen
Mag. Judge R. Steven Whalen

**[PROPOSED] ORDER PERMITTING DEFENDANT REDBOX
AUTOMATED RETAIL, LLC TO FILE EXHIBITS UNDER SEAL**

This matter having come before the Court on Defendant Redbox Automated Retail, LLC (“Redbox”)’s Motion to file one exhibit to its Memorandum of Law in support of its Motion for Summary Judgment (“Memorandum) under seal, and six exhibits to the Declaration of Michael Wokosin (“Wokosin Declaration”) submitted in support of Redbox’s Motion for Summary Judgment under seal in accordance with LR 5.3(b), LR 26.4 and the Protective Order (Docket No. 34) entered in this case, and the Court being advised in all of the premises;

IT IS HEREBY ORDERED that Redbox is authorized to file the following exhibits under seal in accordance with LR 5.3(c):

- Exhibit 1 to its Memorandum, excerpts from the deposition of Plaintiff Radha Sampat, which contains information protected by the Michigan Video Rental Privacy Act (“VRPA”). The parties stipulate to Redbox filing a publicly available version with redactions only for the information protected by the VRPA;
- Exhibits 2 and 3 to the Wokosin Declaration, Plaintiffs’ rental history with Redbox, both of which contain information protected from disclosure by the VRPA;
- Exhibit 16 to the Wokosin Declaration, contracts between Redbox and certain third-parties, all of which were marked as Confidential pursuant to the Protective Order, and contain sensitive and proprietary information to Redbox and those third-parties;
- Exhibit 17 to the Wokosin Declaration, an affidavit produced by a third-party subpoenaed in this matter, which was marked by that third-party as Confidential pursuant to the Protective Order;
- Exhibit 18 to the Wokosin Declaration, a transcript of a phone call placed by Plaintiff Radha Sampat to Redbox’s customer service representatives, which contains information protected by the VRPA; and
- Exhibit 19 to the Wokosin Declaration, a screenshot of Redbox’s customer service system, which contains information protected by the VRPA.

Pursuant to Local Rule 5.3(b)(2)(A)(iv), means other than sealing is not available or unsatisfactory for each of these exhibits because they either contain information protected by statute from disclosure, or contain sensitive business information to either Redbox or a third-party.

APPROVED AND HEREBY ORDERED THIS _____ day of _____, 2014.

Honorable Gerald E. Rosen